

DOYLE LOWTHER LLP
WILLIAM J. DOYLE II (SBN 188069)
bill@doylelowther.com
KATHERINE S. DIDONATO (SBN 272704)
kate@doylelowther.com
1801 Century Park East, 24th Floor
Los Angeles, CA 90067
Telephone: (213) 867-1777
Facsimile: (213) 867-9922

[Additional Counsel on Signature Page]

Attorneys for Plaintiffs and the proposed class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHANE GALITSKI, RICHARD
TALIAFERRO and BRIAN
NEWBOLD, individually and on behalf
of all others similarly situated.

CASE NO. 8:CV-12-00903-CJC (JRPx)

**STIPULATION RE RELIEF FROM
LOCAL RULE 23-3**

Plaintiffs,

V.

SAMSUNG
TELECOMMUNICATIONS,
AMERICA, LLC, a New York
corporation.

Defendant

Pursuant to Local Rule 8-3, Plaintiffs Shane Galitski, Richard Taliaferro and Brian

Newbold, individually and on behalf of all others similarly situated (collectively “Plaintiffs”) and Defendant Samsung Telecommunications America, LLC (“Defendant”), by and through their attorneys of record, hereby agree and stipulate that Plaintiffs be

1 relieved of the requirement in Local Rule 23-3 of filing a class certification motion within
2 90 days of service of the complaint, and that the deadline for filing Plaintiffs' class
3 certification motion be set by the Court at the Rule 26 scheduling conference.
4

5 Plaintiffs filed a Class Action Complaint on June 6, 2012. The parties have agreed
6 to extend Defendant's response date to Plaintiff's initial Class Action Complaint to
7 August 2, 2012. Local Rule 23-3 requires that Plaintiff file a motion for class certification
8 within 90 days after service of the class action complaint, or by September 5, 2012, unless
9 otherwise ordered by the Court.
10

11 The parties mutually request that Plaintiffs be relieved of the requirement of Local
12 Rule 23-3, of filing a class certification motion within 90 days of service of the complaint,
13 and that the deadline for filing Plaintiff's class certification motion be set by the Court at
14 the Rule 26 scheduling conference. The parties mutually agree to have a proposed class
15 certification schedule prepared before the Rule 26 scheduling conference.
16
17

18 IT IS SO STIPULATED.
19

20 DATE: July 24, 2012 Respectfully submitted,

21 **DOYLE LOWTHER, LLP**
22 1801 Century Park East, 24th Floor
23 Los Angeles, CA 90067
24 213.867.1777 – Telephone
25 213.867.9922 – Facsimile

26 By: /s/ William Doyle
27 William J. Doyle, II (CA SBN 188069)
28 bill@doylelowther.com
Katherine S. DiDonato (CA SBN 272704)
kate@doylelowther.com

1
2 DOYLE LOWTHER, LLP
3 John A. Lowther (CA SBN 207000)
4 john@doylelowther.com
5 James R. Hail (CA SBN 202439)
jim@doylelowther.com
6 10200 Willow Creek Road, Suite 150
7 San Diego, CA 92131
8 858.935.9960 – Telephone
858.939.1939 – Facsimile

9
10 GLYNN LAW GROUP
11 Thomas E. Glynn
tom@glynnwgroup.com
12 10200 Willow Creek Road, Suite 170
San Diego, CA 92131
13 858.271.1100 – Telephone
858.876.1530 – Facsimile

14
15 THE CONSUMER LAW GROUP
16 Alan M. Mansfield
alan@clgca.com
17 10200 Willow Creek Road, Suite 160
San Diego, CA 92131
18 619.308.5034 – Telephone
888.341-5048 – Facsimile

20
21 STANLEY-IOLA, LLP
22 Marc R. Stanley
marcstanley@mac.com
23 Martin Woodward
24 Scott Kitner
310 Monticello Avenue, Suite 750
Dallas, TX 75205
25 214.443.4300 – Telephone
214.443.0358 - Facsimile

26
27 ATTORNEYS FOR PLAINTIFFS
28 AND THE PROPOSED CLASS

1 Dated: July 24, 2012

LYNN TILLOTSON PINKER & COX, L.L.P.
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
(214) 981-3800 - Telephone
(214) 981-3839 - Facsimile

5 By: /s/ Jeffrey Tillotson

6 Jeffrey M. Tillotson, P.C. (CA SBN 139372)
7 jtillotson@lynnlp.com

8 **ATTORNEYS FOR DEFENDANT**
9 **SAMSUNG TELECOMMUNICATIONS AMERICA**
L.L.C.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on **July 24, 2012**.

VIA ECF

Thomas E. Glynn
tom@glynnlawgroup.com
GLYNN LAW GROUP
10200 Willow Creek Road,
Suite 170
San Diego, CA 92131
858.271.1100 – Telephone
858.876.1530 – Facsimile

VIA ECF

Alan M. Mansfield
alan@clgca.com
THE CONSUMER LAW GROUP
10200 Willow Creek Road,
Suite 160
San Diego, CA 92131
619.308.5034 – Telephone
888.341-5048 – Facsimile

VIA ECF

Marc R. Stanley
marcstanley@mac.com
Martin Woodward
Scott Kitner
STANLEY-IOLA, LLP
310 Monticello Avenue, Suite 750
Dallas, Texas 75205
214.443.4300 – Telephone
214.443.0358 – Facsimile

VIA ECF

Jeffrey M. Tillotson
jmt@lynllp.com
jtillotson@lynllp.com
LYNN TILLOTSON PINKER &
COX LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
214.981.3800 - Telephone
214.981.3839 - Facsimile

/s/ William Doyle
William Doyle